

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PLANS ADMINISTRATION COMMITTEE :
OF CITIGROUP, INC., IN ITS CAPACITY : Case No. 07-CV-3719
AS PLAN ADMINISTRATOR OF THE :
CITIGROUP HEALTH BENEFITS PLAN, :
 : **Rule 7.1 Statement**
Plaintiff, :
 :
vs. :
 :
PIERS REDDY, STACY REDDY AND :
SULLIVAN, PAPAIN, BLOCK, MCGRATH :
& CANNAVO, P.C. :
 :
Defendants. :

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel certifies that the plaintiff is not a non-governmental corporate party, but rather, a fiduciary of an ERISA employee welfare benefit plan, and consequently Rule 7.1 does not apply. Regardless, there are no corporate parents, affiliates and/or subsidiaries of the plaintiff.

DATE: May 8, 2007

/s/ Thomas M. Kelly
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